

United States District Court
Southern District of New York

1:20-cv-01084-VEC

Herbie Hamilton, individually and on behalf
of all others similarly situated,

Plaintiffs,

- against -

Orgain, Inc.,

Defendant

Joint Status Report

Pursuant to the Court's June 10, 2020 Order, Plaintiff respectfully submits this Joint Status Report to update the Court as to where the case stands.

Plaintiff's Position. Pursuant to the Court's April 13, 2020 Memo Endorsement, the parties were instructed to meet and confer in good faith and exchange informal discovery in an attempt to resolve the case. On May 14, 2020, Plaintiff submitted a Status Report indicating that the parties had exchanged settlement offers and were in the process of exchanging and providing discovery requests.

On May 15, 2020 Plaintiff sent Defendant Plaintiff's First Request for Production of Documents, Electronically Stored Information and Tangible Things Pursuant to Rule 34. Plaintiff sent this document to Defendant and noted that it was not a formal discovery request but instead a way of collecting and organizing the informal discovery requests that the Court directed the parties to exchange.

Defendant has not responded to this request and the parties have not undertaken any discovery. Plaintiff remains ready to engage in good faith settlement discussions and limited discovery with Defendant.

Defendant's Position. Defendant is currently in the process of gathering certain responsive

documents to Plaintiff's informal discovery. Defendant is further in the process of preparing informal discovery to Plaintiff and anticipates exchanging both its responsive documents and discovery requests shortly.

Dated: July 15, 2020

Sheehan & Associates, P.C.

/s/Christopher Patalano

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Call & Jensen

Counsel for Defendant Orgain, Inc.

1:19-cv-03209-RJD-ST
United States District Court
Eastern District of New York

Mohammed Garadi et al., individually and on behalf of all others similarly situated,

Plaintiffs,

- against -

Mars Wrigley Confectionery US, LLC,

Defendant

Joint Status Report

Sheehan & Associates, P.C.
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Pursuant to 22 NYCRR 130-1.1, the undersigned, an attorney admitted to practice in the courts of New York State, certifies that, upon information, and belief, formed after an inquiry reasonable under the circumstances, the contentions contained in the annexed documents are not frivolous.

Dated: July 15, 2020

/s/ Spencer Sheehan
Spencer Sheehan

Certificate of Service

I certify that on July 15, 2020, I served or transmitted the foregoing by the method below to the persons or entities indicated, at their last known address of record (blank where not applicable).

	CM/ECF	First-Class Mail	Email
Defendant's Counsel	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>Plaintiffs' Counsel</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

/s/ Spencer Sheehan
Spencer Sheehan